

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation to Explore the Potential for
Geologic Carbon Sequestration for Carbon
Dioxide Produced by Wisconsin's Electricity
Generation Fleet

Docket 05-EI-145

**MOTION OF WISCONSIN PUBLIC SERVICE CORPORATION
TO INTERVENE**

Wisconsin Public Service Corporation ("WPSC") hereby moves pursuant to Wis. Stat. § 227.44 and Wis. Admin. Code § PSC 2.21(1) to intervene by right in this proceeding. WPSC's undersigned attorneys also hereby file a Notice of Appearance. In support of its motion, WPSC states the following:

1. WPSC is a public utility organized under the laws of the State of Wisconsin with its principal office located at 700 North Adams Street, Green Bay, Wisconsin. WPSC is an integrated electric and natural gas public utility that serves over 433,000 electric customers in north central and northeastern Wisconsin and Michigan's Upper Peninsula, and over 314,000 natural gas customers in north central and northeastern Wisconsin.
2. The Notice of Investigation in this matter states that the investigation will "explore the potential for geologic carbon sequestration produced by Wisconsin's electricity generation fleet."
3. This docket may result in decisions that affect how WPSC is regulated and its costs of providing utility service, particularly as related to the operation of its electric generating facilities.
4. As a public utility, and a generator and purchaser of electrical power, WPSC has a substantial interest in this matter that cannot be adequately represented by any other party.

WPSC requests that the undersigned be included on the service list for this proceeding, and that the following person also be included on the courtesy copy list:

Dennis M. Derricks
Director – Electric Regulatory Policy & Analysis
Wisconsin Public Service Corporation

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For these reasons, WPSC requests that its motion to intervene be granted and that it be made a party to this proceeding.

Dated this 22nd day of May, 2008.

Respectfully submitted,

/s/ Bradley D. Jackson
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